

Office of the Chapter 13 Standing Trustee

Isabel C. Balboa, Chapter 13 Standing Trustee†

Jane L. McDonald, Counsel

Raymond H. Shockley, Jr. Staff Attorney

Jennifer R. Gorchow, Staff Attorney

Kelleen E. Stanley*

Jennie P. Archer*

Lu'Shell Alexander*

*Certified Bankruptcy Assistant

†Fellow, American College of Bankruptcy

July 31, 2019

The Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court
P.O. Box 2067
Camden, New Jersey 08102

RE: Chapter 13 Bankruptcy
Debtor(s) Name: Jennifer and Ryan Kahoun
Case No: 19-24647 ABA

Dear Judge Altenburg:

Please accept this letter in lieu of a more formal response and in support of the Order to Show Cause for Failure to Meet Credit Counseling Requirements and Failure to File Missing Documents, which is returnable August 20, 2019 at 10:30 a.m.

Debtors have collectively filed seven (7) Bankruptcy Petitions within the past ten (10) years, six (6) of which have been filed within the past eight (8) months as self-represented Debtors. The following cases have been filed by Debtors:

Case No.	Debtor	Date filed	Date dismissed	Reason for Dismissal
09-21970 JHW	Joint	5/11/09	8/21/2009	Chapter 7 Discharge received
18-32299 ABA	Jennifer	11/9/18	12/12/2018	Failure to file missing documents
19-10827 ABA	Jennifer	1/14/19	2/13/2019	Failure to file missing documents
19-15234 ABA	Jennifer	3/15/19	4/16/2019	Failure to file missing documents
19-21579 ABA	Ryan	6/10/19	7/10/2019	Failure to file missing documents and failure to meet credit counseling requirements
19-23720 ABA	Ryan	7/15/19	7/15/2019	Still an active case as of date of this correspondence
19-24647 ABA	Joint	7/29/19		

Debtors have acted in bad faith by collectively filing seven Bankruptcy Petitions, six of which have been filed within the past eight months, by having two active bankruptcy petitions, by failing to meet credit counseling requirements, failing to provide documents, failing to pay filing fees, failing to provide tax returns and/or proof of income; failing to attend §341(a) Meeting of Creditors, and failing to submit plan payments to the Trustee. The conduct of Debtors is evidence of an attempt to utilize the Court to hinder and delay payments to creditors.

Based on the foregoing, pursuant to 11 U.S.C. §1307(c), the Trustee respectfully requests

Debtors' case be dismissed with prejudice. The Trustee further requests pursuant to 11 U.S.C. §§ 105(a), 109(g), 349(a), and 1307(c) and R. 9011(c), that this Honorable Court impose on the Debtors sanctions in the form of a 180-day bar on future filings and such other sanctions as this Court may deem appropriate to deter repetition of such conduct by the Debtors or comparable conduct by others similarly situated.

As always, please feel free to contact this office with any questions or concerns.

Respectfully submitted,

/s/ Jennifer R. Gorchow
Jennifer R. Gorchow
Staff Attorney

JRG/jpa

c: Jennifer and Ryan Kahoun (Via Regular Mail)